

**MEMO ENDORSED**

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March 25, 2021

**Via ECF**

Hon. Valerie E. Caproni, U.S.D.J.  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, New York 10007

Re: Ramirez al v. 400 West 23<sup>rd</sup> Street Restaurant Corp., et al  
Case No.: 1:19-cv-10571 (VEC)

Your Honor:

We represent Plaintiff in the above-referenced case brought pursuant to, *inter alia*, the Fair Labor Standards Act ("FLSA") and New York Labor Law "NYLL"), against Defendants. We write to request that the deadline for Plaintiff to move for conditional certification be extended from March 26, 2021 to April 16, 2021. The parties have been discussing issues related to this motion as well as attempting to potentially settle this lawsuit after participating in a mediation through the SDNY panel. In fact, the parties are trying to settle the case (if possible) in the upcoming days. In order to save time and resources that can be used towards settlement, we ask that the deadline be extended to April 16, 2021. We apologize for not making this request sooner; however, counsel for the parties were not able to communicate regarding a proposed extension of time until very late last night. This is Plaintiff's second request for an extension of this deadline, and Defendants consent to the request. Plaintiff's first request for an extension of this deadline was granted. We thank the Court for its attention and consideration to this matter.

Application GRANTED.

SO ORDERED.



Date: March 25, 2021

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE

Respectfully submitted,

/s/ Louis M. Leon

By Louis M. Leon (LL 2057)

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